

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNITED STATES OF AMERICA)
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V.) CR. NO. 19-57(LO)
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TYLER LE)
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Defendant)

**DEFENDANT'S EMERGENCY MOTION FOR RELEASE TO ATTEND HIS
GRANDFATHER'S FUNERAL**

COMES NOW, TYLER LE, defendant, through undersigned counsel Dwight E. Crawley, and respectfully moves that this Honorable Court order the release of the defendant on Friday, October 18, 2019, at 8:00 a.m., to attend his grandfather's funeral and to return to the Alexandria Jail by Friday, October 18, 2019, at 2:00 p.m. Counsel has been provided a copy of the death certificate as well as the obituary verifying the death of the decedent and listing the time and location of the service as well as the reception. These documents can be provided to the court upon request, however, counsel has not included them in this filing due to the nature of this case. The service will be from 10:00 a.m. until 11:00 a.m., and the family will receive guests immediately after the service.

Counsel has spoken with the government about this matter and the government opposes this request. Counsel has also spoken with Pre-Trial Services about this request and Pre-Trial defers to the court. In addition, Pre-Trial will attempt to accommodate any conditions set by this court concerning the defendant's release, to include: electronic monitoring. However, at the time of this filing, Pre-Trial is not sure that it will have the necessary equipment or personnel to support electronic monitoring.

As an alternative to personal recognizance or electronic monitoring, the defendant seeks an order from this court directing the Alexandria Sheriff's Office or the United States Marshal Service to escort the defendant to the services outlined in this motion.

WHEREFORE, counsel respectfully requests that this court grant the defendant's Motion for release to attend his GRANDFATHER's funeral.

Respectfully submitted
TYLER LE

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of October, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all attorneys of record.

/s/

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